

Planning for the Future - Impact on Rye

Background

1. Rye Town Council may recall that on 10 August I wrote explaining the Government's proposals for an overhaul of England's planning system. My note covered the White Paper, "Planning for the Future", which was headlined as a simpler, faster, people-focused system to deliver the homes and places that are needed. The new policy would replace what is claimed is an "outdated and cumbersome planning system."

2. Under this new policy, Local Authorities would be told to make simpler more accessible plans with planning policies drawn from a country wide template enshrined in a revised National Planning Policy Framework (NPPF). It would seek to be "thoroughly democratic" with the process being "more online" and providing "local people with a greater say in where development goes".

3. All this sounds familiar to Neighbourhood Planners! However the detailed process of engaging local communities is unclear. What is reassuring is that one of the key proposals (Proposal Number 9) is for Neighbourhood Plans to "continue to be supported".

4. The White Paper has received a mixed response.

- Many developers have welcomed the proposed changes. Gleeson Homes have offered strong support; the Confederation of British Industry, said that the proposed reforms would allow house builders to get to work and good quality homes could help meet climate targets; Network Homes have welcomed the proposals: "would help increase the delivery of affordable homes".

- Others have been not so welcoming. The Royal Town Planning Institute (RTPI), has voiced concern about the “planner bashing rhetoric” and argued that sweeping away the planning system was not the right response. The Royal Institute of British Architects agreed that the planning system needed to be reformed but are less sure about the proposals. The Campaign to Protect Rural England has voiced concerns about how community involvement would work and identify “missed chances” around carbon-neutral, affordable housing. The housing charity, Shelter, has expressed concern at the reforms’ potential impact on social housing.
- The White Paper has not been welcomed universally in Parliament. The former Prime Minister, Theresa May, supported by a clutch of former ministers, has demanded a rethink on the proposals. She has attacked the algorithm used to compute future housing targets, arguing that the approach is mechanistic and ill-conceived. She has suggested that far from strengthening local democracy it weakens it. She has called for the government to return with a "comprehensive proposal" ahead of a "proper debate" on planning reforms. Some opposition politicians have said that the proposals are just tinkering with the planning laws and what is really needed is a huge house-building programme of social homes for rent. In short what is needed is more investment rather than simplified planning.

The Rother District Local Plan

5. We cannot predict the passage of this national policy but against this backdrop, Rother District has embarked on a revision of its Local Plan, because it is now time expired. Therefore within two years, there is a prospect of a revised [Local Plan](#) (2006) with related [Core Strategy](#) (2014) and [Development and Site Assessment](#)

[\(DaSA\)](#) (2019). Quite how this will reflect national policy has yet to be determined. What is clear is that there will be higher national housing targets and this will result in a revised local plan that will demand higher housing targets across Rother District.

6. To achieve the change, Rother District Planners have called for initial views on the current policy and embarked on work to identify land with future development potential. They intend to formalise the latter by calling for a Housing and Employment Land Assessment (HELA) ([to replace the 2013 SHLAA](#)) from all Towns and Parishes.

7. Naturally with a recently completed (July 2019) [Rye Neighbourhood Plan](#), (RNP) the prospect of this work does not appeal, but the Town Clerk and I have embarked on it and completed the first questionnaires. The Rye Planning and Townscape Committee approved this work, which involved a preliminary examination of the built area of Rye with a view to identifying any scope for future and further development. Of course this was done very thoroughly in the six years work on the RNP and in our response we have explained this.

8. Neighbourhood Planners discussed all this with the Rother Planners at a recent periodic and informal Rother District Neighbourhood Planning meeting, coordinated by the Chair of Rother Planning. Most Neighbourhood Planners were dismayed but acknowledged the need to contribute to this important work. As Rye has a recent NP, we are in a much better (and stronger, because of the evidence therein) place to argue Rye's case for not reinventing the wheel.

9. For the future work, we need to clear some lines. It is proposed that we take an approach as below. :

- Rye has a very recently-made (July 2019) Neighbourhood Plan (RNP), which conforms to all current policy. In particular, the NP reflects the understanding by Rother District that there are serious constraints on any development around Rye. (Copied for ease of reference) *Para 10.12 “Due to its topographical and landscape context and statutory designations, Rye is heavily constrained and further opportunity for development on the periphery of the town is confined. The strategy for Rye and Rye Harbour is the development of key development sites and infill within the built up urban area. Given the environmental constraints surrounding Rye, the uncertainty surrounding the deliverability of existing allocations and limited further opportunities within the existing built-up area, as identified in the Strategic Housing Land Availability Assessment (SHLAA) 2013, it would be appropriate to adopt a range of housing growth to allow for some flexibility. An appropriate range for housing growth in Rye and Rye Harbour will be 355-400 dwellings up to 2028 including existing allocations. The range allows for scope to further redevelop existing commercial sites for mixed use, subject to detailed assessment. The process of identifying key sites suitable for development will be undertaken in the Rye Neighbourhood Plan.*
- Because of the constraints surrounding Rye – protected habitats and flood risk - significant RNP work was expended on a review of the development boundary. We would not want to abandon that boundary as it constrains development creep, unless there are compelling arguments for doing so.
- For the RNP we “over-planned” the housing numbers (160 over 120), with Rother District agreement, on the basis that some development might not be achievable in the timescale for reasons of flood risk mitigation or viability. Although there has been some recent windfall development, only three of the

six main development sites allocated in the RNP are subject to planning proposals. Since making the plan, we have concluded from our discussions with developers that the existing allocations of land might provide scope for additional numbers (above those in the RNP) and we would prefer to focus on those before considering any other sites or additional land, particularly beyond the development boundary.

- To preserve the character of Rye – a key plank of the RNP – we would make clear that that Rye does not want further development on the scale of Valley Park as there is no suitable land without pushing out into the Marsh or AONB thereby disturbing the character of Rye. That is exactly why the RNP focuses on new development being distributed across Rye on mainly brownfield sites.
- When we get to future housing need, we would want a serious conversation about where second homes and “buy to let” dwellings fit into the overall plan. We estimate that there are several hundred of this category in and around Rye out of the total stock of around 2500.
- With the low prospect of any early building of “affordable homes” on allocated development land because of lack of viability, all opportunities should be taken to build starter homes for local people. The allocated sites of the former schools at Tilling Green and Freda Gardham present the best opportunities as and when proposals come forward. A Rother District initiative to be welcomed is the newly formed “arms length” Rother Alliance Homes Ltd company, but its intentions need to be better communicated and subject to more local consultation.

- In anticipation of revised national policy, we should look closely at future design to ensure sustainability (particularly power and water) and that all new buildings reflects the sense of place of Rye and the constraints, particularly flood risk, drainage, access and parking.

Rye Town Council

10. Therefore at this stage, Rye Town Council is invited to:

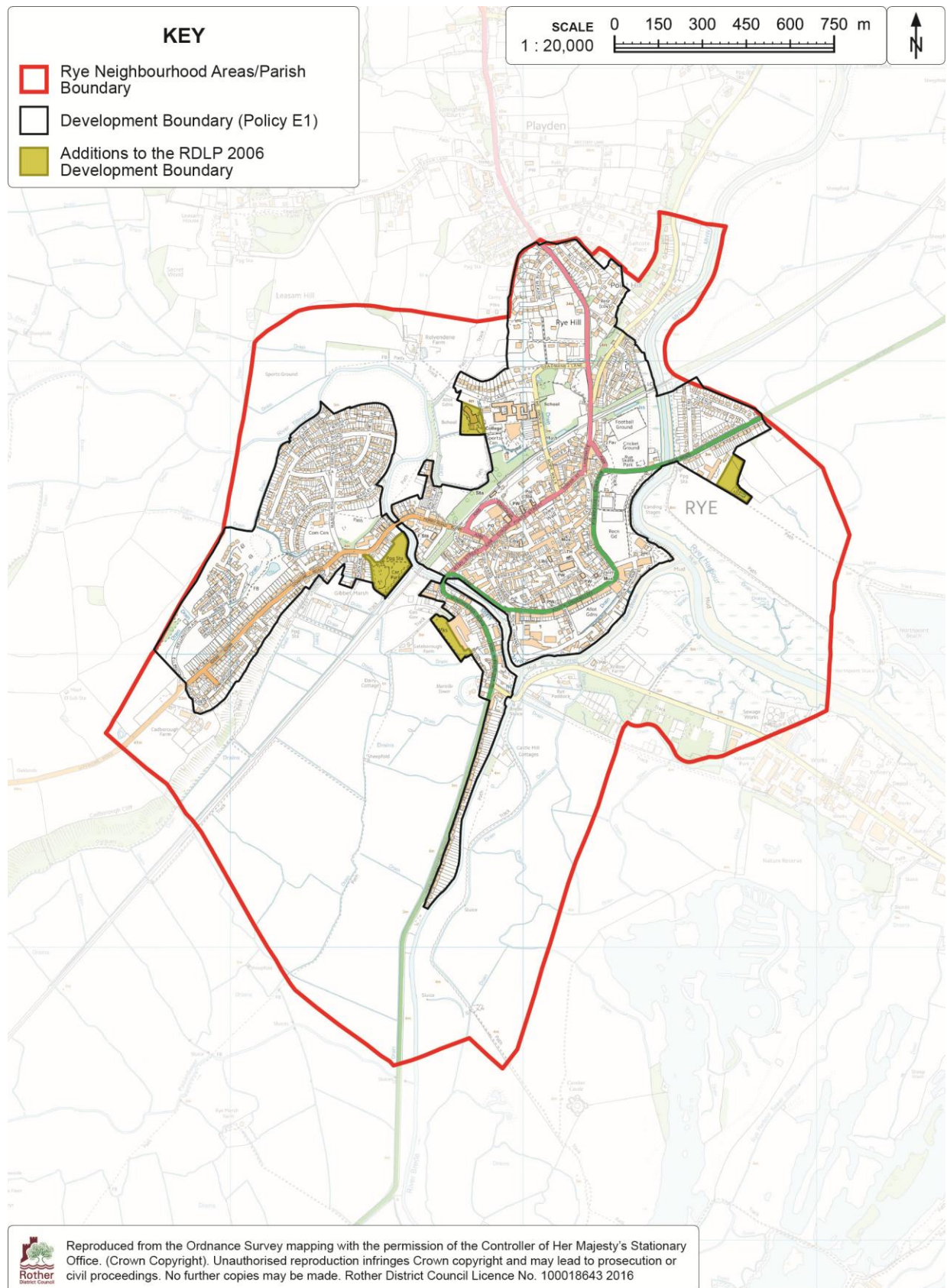
- **NOTE this work on planning for the future**; initially handled by the Town Clerk and Vice Chair RNPSG reporting to the Rye Planning and Townscape Committee, but to be prepared to reconvene a refreshed RNPSG as necessary;
- **AGREE the approach in para 9 above.**


Colonel Anthony Kimber

Vice Chair RNPSG

October 2020

Enclosure: Rye Map showing the relevant boundaries as recorded in the Rye Neighbourhood Plan



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